

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
KATHERINE ROSENFIELD
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10th FLOOR
NEW YORK, NEW YORK 10020

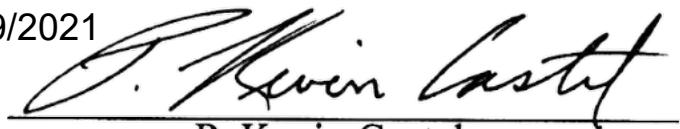
TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

DIANE L. HOUK
EMMA L. FREEMAN
DAVID BERMAN
HARVEY PRAGER
SCOUT KATOVICH
MARISSA BENAVIDES
NICK BOURLAND
ANDREW K. JONDAHL
ANANDA BURRA
MAX SELVER
VIVAKE PRASAD
NOEL R. LEÓN

April 27, 2021

**Application GRANTED.
SO ORDERED.**

Dated: 4/29/2021



P. Kevin Castel
United States District Judge

Via ECF

Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street, Courtroom 11D
New York, NY 10007

Re: *Dame Products v. The Metropolitan Transportation Authority, et al.,*
Case No. 19 Civ. 05649 (PKC)

Your Honor:

We represent Plaintiff Dame Products in the above-captioned matter. [We write jointly with counsel for Defendants to respectfully request an extension of time from April 30, 2021 to May 21, 2021 for the parties to file pre-motion letters in anticipation of moving for summary judgment and an extension of time from May 21, 2021 to June 11, 2021 for the parties to complete expert discovery.] Two previous requests for an extension of the pre-motion letter deadline were made and granted. *See* Dkt. No. 53, Dkt. No. 55. Three previous requests for an extension of the expert discovery deadline were made and granted. *See* Dkt. Nos. 38-39, 40, 42, 55. The next Court conference is scheduled for May 24, 2021. *See* Dkt. No. 55.

The parties request these extensions because of their ongoing substantive settlement discussions. The parties continue to exchange settlement proposals and counter-proposals and are hopeful that this matter can be resolved without further intervention from the Court. Accordingly, the parties continue to believe it will be more efficient to devote resources to settlement conversations than to divert those resources toward expert discovery and possible summary judgment motion preparation.

For the foregoing reasons, the parties respectfully request that the Court extend the deadline to file pre-motion letters in anticipation of moving for summary judgment from April 30, 2021 to May 21, 2021 and the deadline to complete expert discovery from May 21, 2021 to June 11, 2021.

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP
Page 2

Respectfully submitted,

/s

Richard D. Emery
Samuel Shapiro
Emma L. Freeman

c. All counsel of record, *via ECF*